

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
TERRE HAUTE DIVISION

PRIDE CENTER OF TERRE HAUTE, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 2:25-cv-76-MPB-MJD
	)	
PRESIDENT, INDIANA STATE UNIVERSITY,	)	
in his official capacity;	)	
VICE PRESIDENT FOR UNIVERSITY	)	
ENGAGEMENT, INDIANA STATE	)	
UNIVERSITY, in her official capacity,	)	
	)	
Defendants.	)	

**Motion for Preliminary Injunction**

Plaintiff, by counsel, moves this Court pursuant to Fed. R. Civ. P. 65 for a preliminary injunction to enjoin defendants to allow Pride Fest 2025 to occur on the Indiana State University campus on September 20, 2025, as plaintiff has previously requested. In support of this motion, plaintiff says that:

1. The failure of the defendants to allow Pride Fest 2025 to occur, as plaintiff has requested, on the campus of Indiana State University violates the First Amendment to the United States Constitution.
2. In the absence of a preliminary injunction, plaintiff will suffer irreparable harm for which there is no adequate remedy at law.
3. This harm outweighs any harm that an injunction would cause defendants.

4. The public interest will not be disserved by the grant of a preliminary injunction.
5. The injunction should issue without bond.
6. Plaintiff intends to separately submit documentary or other evidence in support of its preliminary injunction request prior or at the hearing on the preliminary injunction. Additionally, plaintiff will submit its memorandum of law in support of this motion within the period established in any briefing schedule set by the Court. That to-be-filed memorandum of law is incorporated herein by reference.
7. Plaintiff further requests that the Magistrate Judge conduct a conference for the purpose of establishing a briefing schedule for this motion.

WHEREFORE, plaintiff requests that this Court issue a preliminary injunction enjoining defendants to allow Pride Center 2025 to occur on campus property on September 20, 2025, as plaintiff has previously requested, and further that the Court grant all other proper relief.

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Attorneys for Plaintiff

### **Certificate of Service**

I certify that on this 19th day of February 2025, a copy of the foregoing was filed electronically with the Clerk of this Court and was served on the below-named party by first class U.S. Postage, pre-paid.

President  
Indiana State University  
Parsons Hall 208  
200 N. 7th St.  
Terre Haute, IN 47809

Vice President for University Engagement  
Indiana State University  
200 N. 7th St.  
Terre Haute, IN 47809

I further certify that a courtesy copy of this motion was served on this 19th day of February 2025 by e-mail on:

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General Counsel  
Indiana State University  
JD.Lux@indstate.edu

Kenneth J. Falk  
Attorney at Law